

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA FOCUSED COMPLIANCE INSPECTION REPORT

FACILITY NAME: MID AMERICA IBC

FACILITY U.S. EPA ID NO.: None

FACILITY TYPE: Non-Notifier

FACILITY ADDRESS: 2300 West Cornell Street
Milwaukee, Wisconsin 53209

U.S. EPA REPRESENTATIVE: Walt Francis

DATE OF INSPECTION: February 24, 2017

NAICS CODE: 332439 – Other Metal Container Manufacturing

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

2/20/2017
Date

APPROVED BY: Julie Morris
Julie Morris, Chief
Compliance Section 2
RCRA Branch

2/27/17
Date

Purpose of Inspection

This inspection was an evaluation of Mid America IBC's compliance with hazardous waste, used oil, and universal waste regulations found in the Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The inspection team included inspectors from the Wisconsin Department of Natural Resources (WDNR), the U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration, and myself. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) focused compliance evaluation inspection (FCI). The site never notified as a generator of hazardous waste.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspectors -
 Walt Francis, RCRA Program
 James Entzminger, EPCRA Program
 Kathy Halbur, Superfund Emergency Response
 Manojkumar Patel, CAA Program

United States Department of Transportation (U.S. DOT) Inspectors –
 Laura Kwilinski, PHMSA
 Mark Razny, PHMSA

Wisconsin Department of Natural Resources (WDNR) Inspectors –
 Edward Lynch, Waste Program
 George Volpentesta, Air Program
 Bryan Hartsook, Wastewater Program
 Steve Mueller, Remediation and Redevelopment Program
 Benjamin Benninghoff, Stormwater Program

Representatives of Mid-America IBC –
 Rodney Knash, Operator
 Linda Benfield, Attorney Foley and Lardner, LLP
 Amanda Beggs, Attorney Foley and Lardner, LLP
 Siva Sambasivam, Greif

Site Description/Background Information

Mid-America Steel Drum Company was established in 1975. Mid-America Steel Drum has four locations in Milwaukee County (3950 S. Pennsylvania Avenue, St. Francis, 2529 E. Norwich Avenue, St. Francis, 8570 S. Chicago Road, Oak Creek, and 2300 W. Cornell St., Milwaukee, Wisconsin). The Cornell Street facility receives 250-gallon plastic and metal totes. The totes are stored prior to processing. Tote processing includes the removal of any liquid contents with a shop vacuum apparatus. The removed liquids are accumulated in 250-gallon totes and sent off-

site as a "Non-Hazardous Waste" to Badger Disposal. The next step includes an internal cleaning with soapy water and caustic. The used cleaning solution is pumped over a paper filter which removes debris. The exterior of the totes are then power washed. Based on customer specifications, either a reused plastic tote or a new plastic tote is placed in the metal tote cage and then sold to the customer. Mid-America personnel told the inspectors that if any tote arrives that contains corrosive or flammable material they are shipped to National Container, Chicago, Illinois. Mid America IBC also operates a "Cut and Scrape Operation" at the Milwaukee facility. Totes which have a residue on the bottom are placed in a saw apparatus which cuts off the bottom of the tote. Workers scrape any remaining residue into 55-gallon drums. The recovered plastic is sold to "Indy Drum". Mid-American IBC employees told the inspectors that any totes that come in as "Heavy" that do not meet the RCRA empty standards are rejected. Mid-America IBC also has a Maintenance Shop where they accumulate used fluorescent lamps. Mid-America IBS processes about 80 totes per day, operates Monday through Friday 6:00 am to 3:30 pm, has seven employees, and has been at this location for 5 years. The building occupies 30,000 square feet, and 2.66 acres. According to Mid America IBC personnel any shipping papers are stored at the Oak Creek facility.

The Milwaukee facility generates cut and scrape waste material and tote vacuuming residue, plastic and metal scrap, and used washwater. Cut and scrape residues and tote liquid residue are shipped to Badger Disposal, plastic and metal scrap are sent off-site to auto scrap yard, and the used wash water and any preflush is picked up by Advanced Waste Disposal.

Opening Conference

U.S. EPA, U.S. DOT, and WDNR representatives arrived at the Mid America IBC facility at approximately 8:55 am. The inspection group entered the facility through the truck gate and entered the facility by the loading dock. The inspectors were taken to the lunch room. The inspectors introduced themselves to Mr. Rodney Knash and Ms. Linda Benfield. A short time later, Mr. James Entzminger arrived at the facility. Inspector Francis presented his credentials to Ms. Benfield. Inspector Francis informed them of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA, U.S. DOT and WDNR personnel. Mr. Knash provided the inspectors with an in depth review of the facility, and provided information on the various waste streams. Ms. Benfield told the inspectors that any photographs taken should be considered CBI. Mr. Rodney Knash allowed the inspector access to the facility to conduct the inspection.

Site Tour

The walk-through began at the Loading Dock area. Mr. Knash explained how totes arrive and are staged for storage (see photograph number 7). Mr. Knash took the inspectors to the Shop Vacuum Area. Mr. Knash explained how any liquid material is vacuumed out of the totes and placed in waste totes, see photographs number 1 and 2. The walk-through continued to the wash area. Mr. Knash showed the inspectors how the insides of the totes are washed with soap, caustic

and water. Mr. Knash then took the inspectors to the filter paper area and wash tanks, see photographs 3, 5, and 6. Inspector Francis observed four 250-gallon totes in this area waiting to be shipped to Badger Disposal, see photograph number 4. Mr. Knash told Inspector Francis that the totes contained tote vacuumed residues. The walkthrough continued to the Maintenance Shop. Inspector Francis observed a box of used compact fluorescent bulbs, see photograph number 8. The walkthrough continued to the "Drain Table". Residues from 250-gallon totes are drained into 55-gallon drums, see photographs 9 and 11. Mr. Knash showed the inspectors the tote cutting area, see photograph number 10. The walkthrough continued outside. Mr. Knash showed the inspectors totes waiting for processing, see photograph numbers 12 and 13. The walkthrough continued indoors, where Mr. Knash showed the inspectors two drum drying ovens and two 55-gallon containers, see photograph number 14. The inspection continued to an older area of the facility. Inspector Francis observed eight 55-gallon containers, see photograph number 15. The walkthrough continued back to the lunch room area. Inspector Francis observed one 250-gallon tote of "Drain Table Residue" waiting to be shipped out and the Cut and Scrape Area Drain Table, and a "Recertified 250-Gallon Tote M4712, see photograph numbers 16, 17, and 18.

The inspectors returned to the lunch room to review records.

Records Review

Mr. Knash provided Inspector Francis with a hazardous waste manifest for one tank truck load of non-hazardous waste water sent to Advanced Waste Services, Milwaukee, Wisconsin. A Non-Hazardous Waste Manifest for the shop vacuum residue sent to Badger Disposal, Milwaukee, Wisconsin, and an example incoming "Empty Totes For Recycle" Bill of Lading from Valspar Corp, Wheeling, Illinois. Inspector Francis asked Mr. Knash about waste determination records. Mr. Knash told Inspector Francis that he had the various waste streams analyzed recently, but did not have the results.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and would be waiting for the waste determination records. Inspector Francis provided a U.S. EPA Small Business Resources, and a U.S. EPA Region 5 Pollution Prevention contact sheet to Mr. Knash.

Attachments

Photographs.

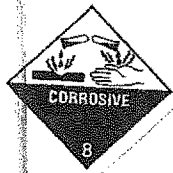
Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number W10 045 953 189		2. Page 1 of 1		3. Emergency Response Code 800/842-9792 (AWC)		4. Manifest Tracking Number 012532568 JJK		
5. Generator's Name and Mailing Address Mid-America Steel Drum Co. 2300 W. Cornell St. Milwaukee, WI 53208						Generator's Site Address (if different than mailing address)				
Generator's Phone: (414) 235-0282 Cherie										
6. Transporter 1 Company Name Advanced Waste Carriers, Inc. (AWC)						U.S. EPA ID Number W10000815301				
7. Transporter 2 Company Name						U.S. EPA ID Number				
8. Designated Facility Name and Site Address Advanced Waste Services - Chemworks 3801 W. McKinley Ave Milwaukee, WI 53208						U.S. EPA ID Number				
Facility's Phone: 414-342-1852						W10000136572				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes	
		Non RCRA regulated, Non DOT hazardous Liquid material			001 TT		200 LBS	KG	NONE	
		WASTE WATER								
		03-07-14								
14. Special Handling Instructions and Additional Information Profile: 3 L 047409-0-B-2-CW										
Trailer & Generation Skipped On-board Site arrival time Site departure time										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Officer's Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____										
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____									
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____ Transporter 2 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____									
	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____									
DESIGNATED FACILITY	18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____ Facility's Phone: _____									
	18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____									
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. _____ 2. _____ 3. _____ 4. _____									
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____										

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number		2. Page 1 of	3. Emergency Response Phone		4. Waste Tracking Number		
5. Generator's Name and Mailing Address					Generator's Site Address (if different than mailing address)				
Generator's Phone:									
6. Transporter 1 Company Name					U.S. EPA ID Number				
7. Transporter 2 Company Name					U.S. EPA ID Number				
8. Designated Facility Name and Site Address					U.S. EPA ID Number				
Facility's Phone:									
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit WL/Vol.	
					No.	Type			
		1.							
		2.							
		3.							
	4.								
13. Special Handling Instructions and Additional Information									
14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.									
Generator's/Officer's Printed/Typed Name					Signature		Month	Day	Year
TRANSPORTER	15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:								
	Transporter signature (for exports only):								
	16. Transporter Acknowledgment of Receipt of Materials								
	Transporter 1 Printed/Typed Name				Signature		Month	Day	Year
	Transporter 2 Printed/Typed Name				Signature		Month	Day	Year
DESIGNATED FACILITY	17. Discrepancy								
	17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
	Manifest Reference Number:								
	17b. Alternate Facility (or Generator)					U.S. EPA ID Number			
	Facility's Phone:								
	17c. Signature of Alternate Facility (or Generator)						Month	Day	Year
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a									
Printed/Typed Name					Signature		Month	Day	Year

Date: 23-Feb-2017		BILL OF LADING		Page 1 of 1		
SHIP FROM						
Name: VALSPAR CORP Address: 1191 S. WHEELING ROAD City/State/Zip: WHEELING, IL. 60090 SID#: 391				Bill of Lading Number: 391-02232017		
FOB: <input type="checkbox"/>				CARRIER NAME: WILL CALL		
SHIP TO						
Name: MID AMERICA STEEL DRUM Address: 2360 W. CORNELL STREET City/State/Zip: MILWAUKEE, WI. 53209 SID#:				Trailer number: Seal number(s)		
FOB: <input type="checkbox"/>				SCAC: Pro number:		
THIRD PARTY FREIGHT CHARGES BILL TO						
Name: VALSPAR C/O CASS I.S. Address: P.O. BOX 17636 City/State/Zip: SAINT LOUIS, MO 63178-7636				Freight Charge Terms: (freight charges are prepaid unless marked otherwise)		
				Prepaid Collect 3rd Party		
SPECIAL INSTRUCTIONS ***PROTECT FROM FREEZING				<input type="checkbox"/> Master Bill of Lading with attached underlying Bills of (check box) Lading		
CUSTOMER ORDER INFORMATION						
CUSTOMER ORDER NUMBER		#PKGS	WEIGHT	Pallet/ Slip	ADDITIONAL SHIPPER INFO	
					<div style="font-size: 2em; font-family: cursive;"> #ATTN SHERRY 60 JUNE 27S FAHED 2-23-17 PK </div>	
GRAND TOTAL						
CARRIER INFORMATION						
HANDLING UNIT		PACKAGE		WEIGHT	COMMODITY DESCRIPTION	
QTY	TYPE	QTY	TYPE		<small>Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC Item 360</small>	
4	TOTE	4	TOTE	600 LBS	EMPTY TOTES FOR RECYCLE LAST CONTAINED (CP0005B) PAINT ADDITIVE, 8, UN3066, II	
56	TOTE	56	TOTE	8400 LBS	EMPTY TOTES FOR RECYCLE LAST CONTAINED LATEX, NOT REGULATED	
60		60		9000 LBS	GRAND TOTAL	
Additional Handling Information				Placards Offered: <input checked="" type="checkbox"/> Y Chep Pallets: N		
Emergency Response, 24-hour number 1-888-748-5558 Outside of USA/Canada +1-703-527-3887						<div style="border: 2px solid black; padding: 10px; width: 100px; margin: auto;">  </div>
<small>Whereas the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:</small> <small>*The agreed or declared value of the property is specifically stated by the shipper to be not exceeding</small>				COD Amount \$ Fee Terms: Collect: <input type="checkbox"/> Prepaid: <input type="checkbox"/> Customer check acceptable: <input type="checkbox"/>		
NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. -14706(c)(1)(A) and (B).						
<small>RECEIVED, subject to individually determined rates or contract that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classification and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state, federal and provincial regulations.</small>				<small>The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.</small>		
SHIPPER SIGNATURE / DATE				CARRIER SIGNATURE / PICKUP DATE		
<small>I hereby declare that the contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transportation according to applicable international and national government regulations.</small>				<small>Carrier acknowledges receipt of packages and required placards. Carrier Certifies emergency response information was made available and / or carrier has the emergency response guidebook or equivalent documentation in the vehicle. Property described above is received in good order, except as noted.</small>		
Trailer Loaded: <input type="checkbox"/> By Shipper <input type="checkbox"/> By Driver				Freight Counted: <input type="checkbox"/> By Shipper <input type="checkbox"/> By Driver <input type="checkbox"/> By Driver/pallets said to contain		
<i>Att A WIL 2/23/17</i>						

Mid America IBC
Milwaukee, Wisconsin
2/24/2017

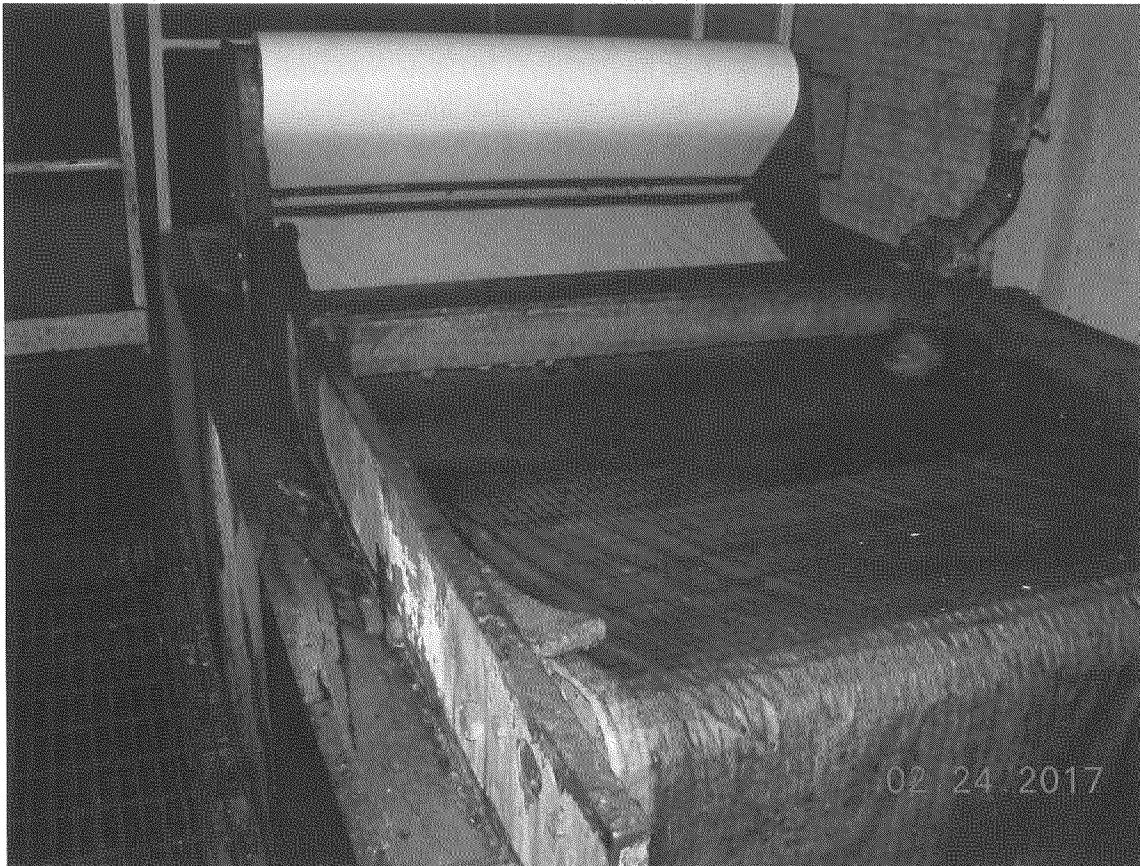


Photograph #1 – Tote Vacuuming Area

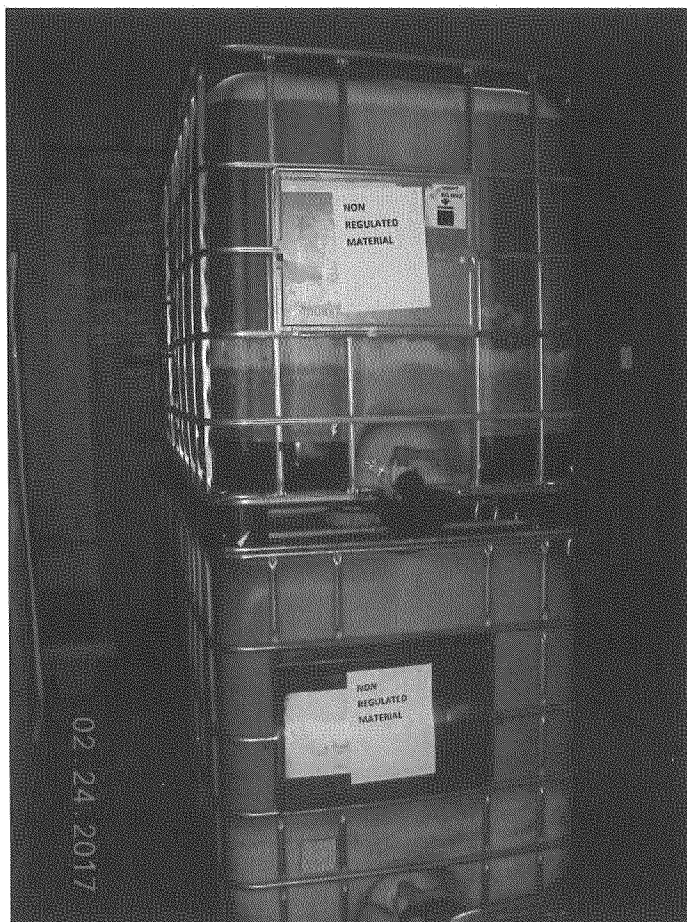


Photograph #2 – Tote Vacuuming Area, Two 250-Gallon Totes with Tote Residues

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Photograph #3 – Wash Water Filter Paper Device



Photograph #4 – Two 250-Gallon Totes of Recovered Tote Residue

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Photograph #5 – Wash Water Area, 55-Gallon Container Near Filter Paper Area



Photograph #6 – Wash Water Area, 55-Gallon Container Near Filter Paper Area

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2/24/2017

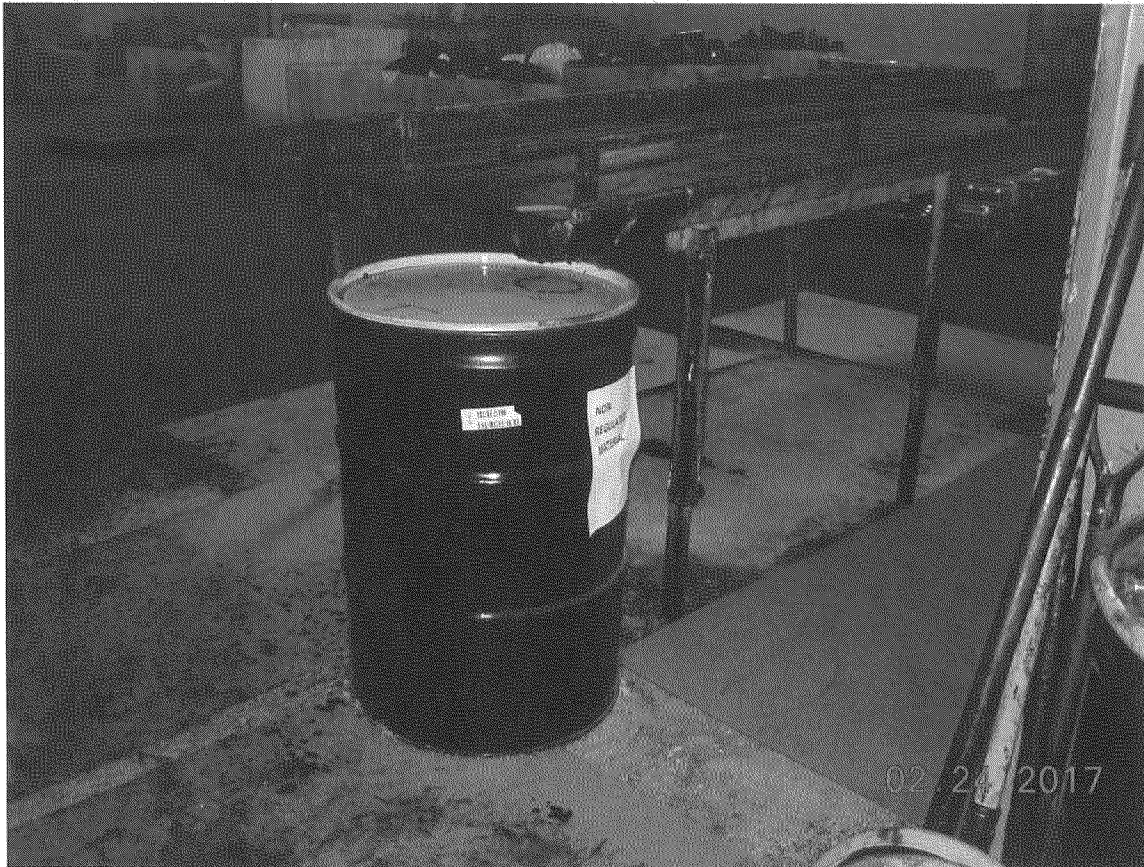


Photograph #7 – 250-Gallon Totes Waiting To Be Processed

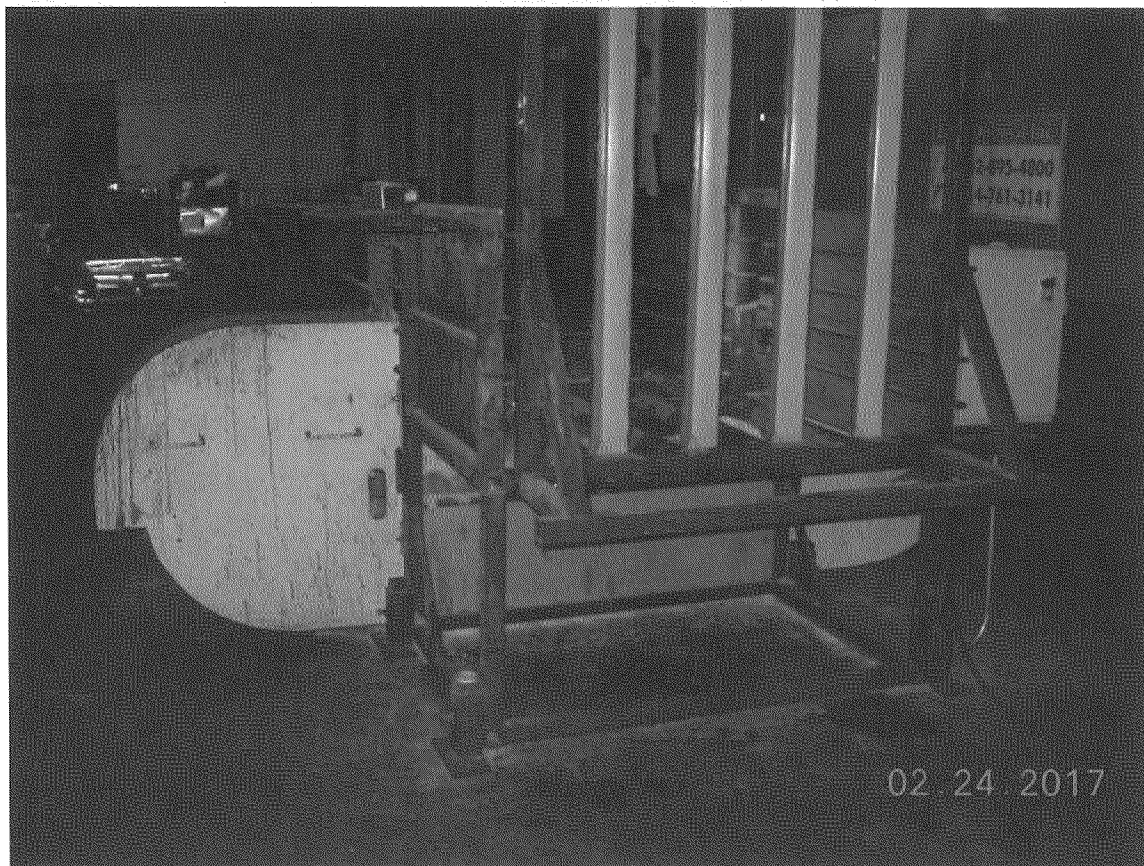


Photograph #8 – Maintenance Shop, Used Fluorescent Lamp Accumulation Area

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Photograph #9 – Cut and Scrape Area, Drain Table and 55-Gallon Container



Photograph #10 – Cut and Scrape Area, Tote Saw

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Photograph #11 – Cut and Scrape Area, 55-Gallon Containers of Tote Residues



Photograph #12 – Outdoor Tote Storage Prior to Processing

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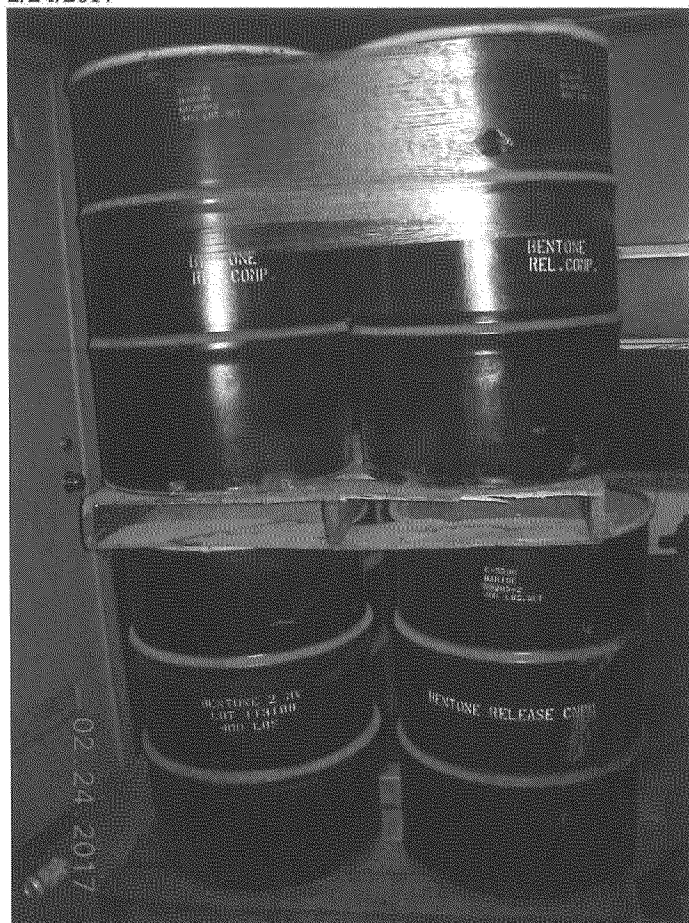


Photograph #13 – Outdoor Tote Storage Prior to Processing (Redacted Company Name)

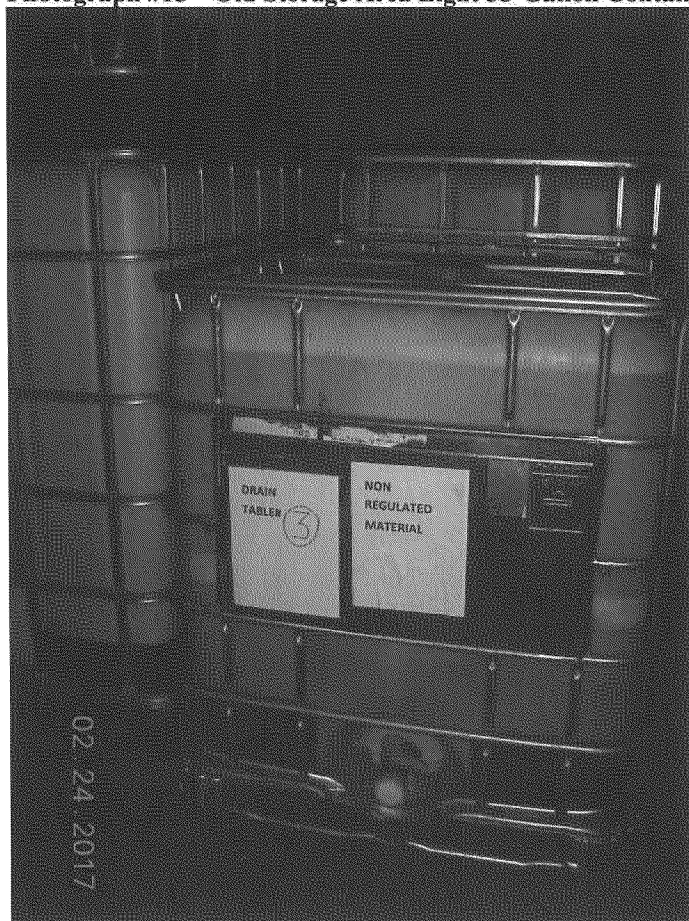


Photograph #14 – Two 55-Gallon Containers Near Drum Ovens

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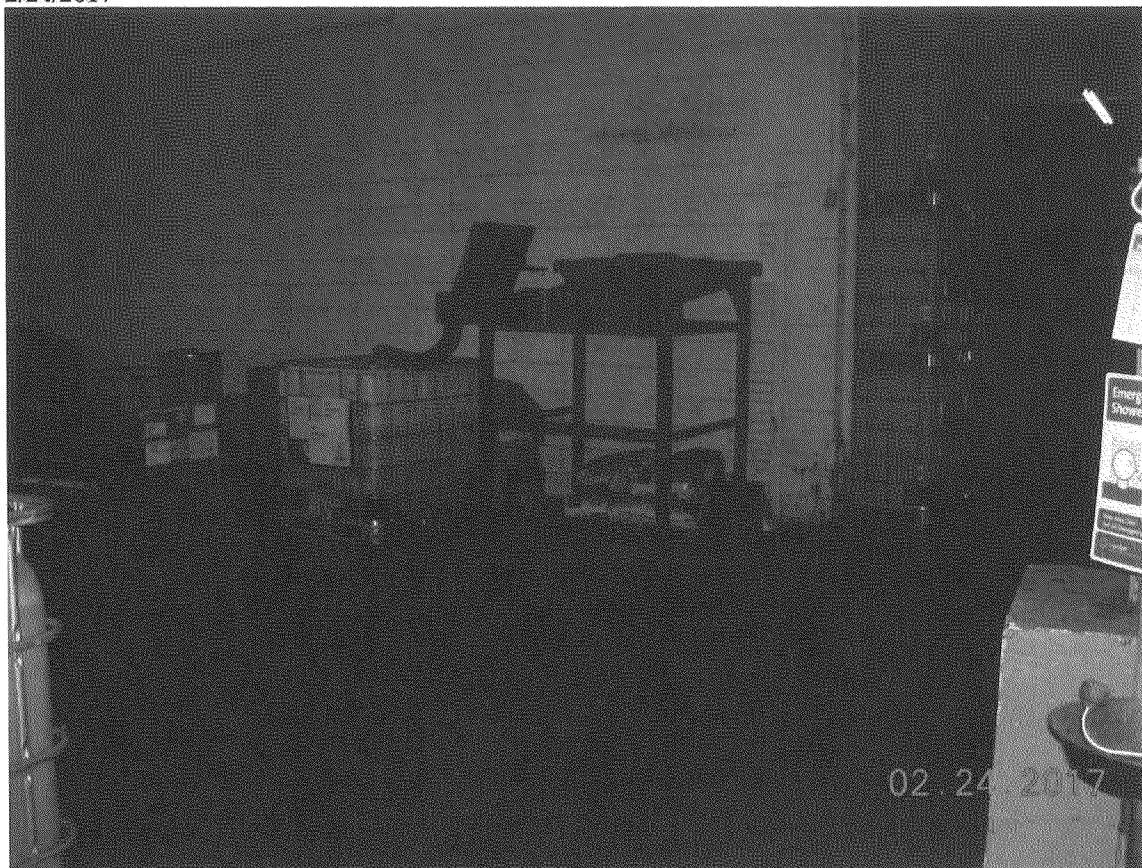


Photograph #15 – Old Storage Area Eight 55-Gallon Containers

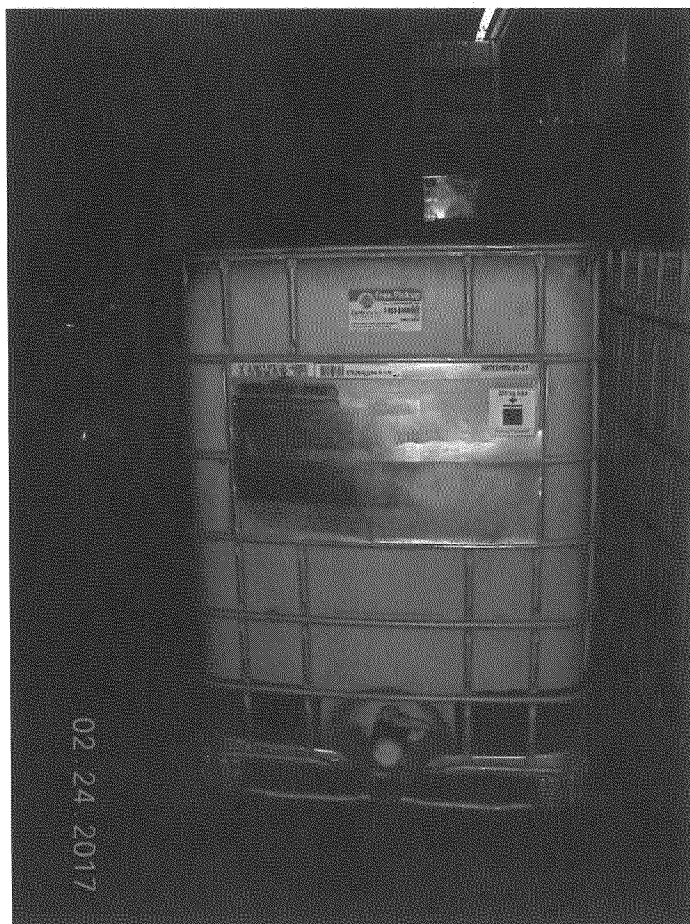


Photograph #16 – 250-Gallon Tote of Drain Table Residue

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2/24/2017



Photograph #17 – Cut and Scrape Area Drain Table and 250-Gallon Tote



Photograph #18 – Recertified 250-Gallon Tote M4712